

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

vs.

CARLTON EDWARDS,

a/k/a "Pops,"

a/k/a "Aubrey Hall,"

a/k/a "Carlton King,"

a/k/a "Renaldo Peters,"

a/k/a "Kelvin Bell,"

a/k/a "Cujo,"

a/k/a "Joe,"

MICHAEL HUBBART,

a/k/a "FD Boy,"

a/k/a "fedex,"

a/k/a "Jason Benjamin,"

a/k/a "the Xman,"

JOSEPH JEFFERSON,

a/k/a "Joe,"

a/k/a "Little Joe,"

KEITH CHISHOLM,

a/k/a "Saul,"

MATTHEW JAMES,

a/k/a "Family,"

DIANE ELLIS,

a/k/a "Diane Thompson,"

a/k/a "Miss D,"

RODRICK CHISHOLM,

KENTON BONNEY,

a/k/a "Clinton,"

KERICE CHATRIE-BONNEY,

a/k/a "the niece,"

CR. NO. : 2:19-cr-628

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 841(b)(1)(D)

21 U.S.C. § 848

18 U.S.C. § 922(g)(1)

18 U.S.C. § 922(g)(5)

18 U.S.C. § 922(a)(2)

18 U.S.C. § 924(e)

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 843(b)

18 U.S.C. § 2

18 U.S.C. § 924(d)(1)

21 U.S.C. § 853

21 U.S.C. § 881

28 U.S.C. § 2461(c)

21 U.S.C. § 802

21 U.S.C. § 851

SUPERSEDING

INDICTMENT

(UNDER SEAL)

WAYLAND PARKER,
a/k/a "the mail man,"

JULIUS WASHINGTON,
SHAQUELLE SMITH,
JOHN NIXON,
DAMIAN MASON,
DOMINIC DASHER,
RICHARD WHITE,

TERRILL HOSKINS,
MIKEL MILLIDGE,
a/k/a "Savage,"

ANTTWON HAYNES,
BRANDON GLOVER,
ANDREW GRAHAM,
a/k/a "Brandy,"

WALTER BEATON,
LEBERT FRAZER,
a/k/a "Dread,"
a/k/a "the Dredder,"

DIAMOND FLOYD
a/k/a "Diamond Dimebag,"
ROBERICK MOULTRIE,
a/k/a "Tootie,"

COUNT 1

THE GRAND JURY CHARGES:

1. That beginning at a time unknown to the Grand Jury, but beginning in at least 2016, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina and elsewhere, the Defendants, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the

Xman," **JOSEPH JEFFERSON**, a/k/a "Joe," a/k/a "Little Joe," **KEITH CHISHOLM**, a/k/a "Saul," **MATTHEW JAMES**, a/k/a "Family," **DIANE ELLIS**, a/k/a "Diane Thompson," a/k/a "Miss D," **RODRICK CHISHOLM**, **KENTON BONNEY**, a/k/a "Clinton," **KERICE CHATRIE-BONNEY**, a/k/a "the niece," [REDACTED] **WAYLAND PARKER**, a/k/a "the mail man," [REDACTED] [REDACTED], **JULIUS WASHINGTON**, **SHAQUELLE SMITH**, **JOHN NIXON**, **DAMIAN MASON**, **DOMINIC DASHER**, **RICHARD WHITE**, [REDACTED] [REDACTED], **TERRILL HOSKINS**, **MIKEL MILLIDGE**, a/k/a "Savage," [REDACTED] [REDACTED] [REDACTED], [REDACTED] **ANTTWON HAYNES**, **BRANDON GLOVER**, **ANDREW GRAHAM**, a/k/a "Brandy," **WALTER BEATON**, **LEBERT FRAZER**, a/k/a "Dread," a/k/a "the Dreadder," **DIAMOND FLOYD**, a/k/a "Diamond Dimebag," **ROBERICK MOULTRIE**, a/k/a "Tootie," and [REDACTED]

[REDACTED] knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute cocaine, a Schedule II controlled substance; cocaine base (commonly known as "crack" cocaine), a Schedule II controlled substance; heroin, a Schedule I controlled substance; and marijuana, a Schedule I controlled substance;

2. The Defendant, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "Fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," **JOSEPH JEFFERSON**, a/k/a "Joe," a/k/a "Little Joe," **KEITH CHISHOLM**, a/k/a "Saul," **MATTHEW JAMES**, a/k/a "Family," **DIANE ELLIS**, a/k/a "Diane Thompson," a/k/a "Miss D," **RODRICK CHISHOLM**, [REDACTED] **WAYLAND PARKER**, a/k/a "the mail man," **JULIUS WASHINGTON**, **SHAQUILLE SMITH**, **DAMIAN MASON**, **DOMINIC DASHER**, and

TERRILL HOSKINS, conspired to possess with the intent to distribute and to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A);

3. The Defendants, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," **ROBERICK MOULTRIE**, a/k/a "Tootie," and [REDACTED] [REDACTED] [REDACTED] [REDACTED] conspired to possess with intent to distribute and to distribute 1 kilogram or more of a mixture of substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A);

4. The Defendants, **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "Fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," and **ROBERICK MOULTRIE**, a/k/a "Tootie," conspired to possess with intent to distribute and to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A);

5. The Defendant, **KERICE CHATRIE-BONNEY**, a/k/a "the niece," conspired to possess with the intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B);

6. The Defendant, **JOSEPH JEFFERSON**, a/k/a "Joe," a/k/a "Little Joe," and **WALTER BEATON**, conspired to possess with the intent to distribute and to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base (commonly known

as “crack” cocaine), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B);

7. The Defendants, **CARLTON EDWARDS**, a/k/a “Pops,” a/k/a “Aubrey Hall,” a/k/a “Carlton King,” a/k/a “Renaldo Peters,” a/k/a “Kelvin Bell,” a/k/a “Cujo,” a/k/a “Joe,” **DIANE ELLIS**, a/k/a “Diane Thompson,” a/k/a “Miss D,” and **WAYLAND PARKER**, a/k/a “the mail man,” conspired to possess with the intent to distribute and to distribute 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B);

8. The Defendants, **JOHN NIXON**, [REDACTED] [REDACTED] [REDACTED] [REDACTED] **MIKEL MILLIDGE**, a/k/a “Savage,” and **BRANDON GLOVER**, **ANDREW GRAHAM**, a/k/a “Brandy,” conspired to possess with the intent to distribute and to distribute a quantity of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);

9. The Defendant, **RICHARD WHITE**, conspired to possess with the intent to distribute and to distribute a quantity of cocaine base (commonly known as “crack” cocaine), in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);

10. The Defendants, **MICHAEL HUBBART**, a/k/a “FD Boy,” a/k/a “fedex,” a/k/a “Jason Benjamin,” a/k/a “the Xman,” and [REDACTED] [REDACTED] [REDACTED] [REDACTED] conspired to possess with the intent to distribute and to distribute a quantity of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C);

11. The Defendants, **MICHAEL HUBBART**, a/k/a “FD Boy,” a/k/a “Fedex,” a/k/a “Jason Benjamin,” a/k/a “the Xman,” **JOSEPH JEFFERSON**, a/k/a “Joe,” a/k/a “Little Joe,” **KEITH CHISHOLM**, a/k/a “Saul,” **MATTHEW JAMES**, a/k/a “Family,” **RODRICK CHISHOLM**, **KENTON BONNEY**, **CHATRICE-BONNEY**, [REDACTED] **JULIUS**

WASHINGTON, SHAQUELLE SMITH, JOHN NIXON, [REDACTED] [REDACTED], TERRILL HOSKINS, MIKEL MILLIDGE, a/k/a "Savage," ANTTWON HAYNES, BRANDON GLOVER, LEBERT FRAZER, a/k/a "Dread," a/k/a "the Dredder," DIAMOND FLOYD, a/k/a "Diamond Dimebag," and [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] conspired to possess with the intent to distribute and to distribute a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D);

All in violation of Title 21, United States Code, Section 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but from at least September of 2017, and continuing thereafter, up to the date of this Superseding Indictment, in the District of South Carolina and elsewhere, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," knowingly, willfully, intentionally, and unlawfully did engage in a continuing criminal enterprise in that he violated Title 21, United States Code, Sections 841(a)(1), 843, and 846 by doing, causing, facilitating, and aiding and abetting the possession with intent to distribute and distribution of 5 kilograms or more of cocaine, a Schedule II controlled substance, which violating were part of a series of violations undertaken by the defendant, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," in concert with at least five other individuals, and with respect to whom the defendant, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," occupied a position of organizer, a supervisory position, and a position of management, and from which the Defendant, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," obtained substantial income and resources;

All in violation of Title 21, United States Code, Section 848.

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about November 21, 2017, in the District of South Carolina, the Defendant, **BRANDON GLOVER**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about November 21, 2017, in the District of South Carolina, the Defendant, **BRANDON GLOVER**, knowingly did possess a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about June 15, 2018, in the District of South Carolina, the Defendant, **JOHN NIXON**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance, and a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(1)(D).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about June 15, 2018, in the District of South Carolina, the Defendant, **JOHN NIXON**, knowingly did possess a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

That on or about January 2, 2019, in the District of South Carolina, the Defendant, **MIKEL MILLIDGE**, a/k/a "Savage," knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That on or about January 2, 2019, in the District of South Carolina, the Defendant, **MIKEL MILLIDGE**, a/k/a "Savage," knowingly did possess a firearm in and affecting commerce, that is a .40 caliber Glock handgun, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 9

THE GRAND JURY FURTHER CHARGES:

That on or about January 2, 2019, in the District of South Carolina, the Defendant, **MIKEL MILLEDGE**, a/k/a "Savage," knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNTS 10-12

THE GRAND JURY FURTHER CHARGES:

That on or about the dates listed below, in the District of South Carolina, the Defendant, **RICHARD WHITE**, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine base (commonly known as "crack" cocaine), a Schedule II controlled substance;

<u>COUNT</u>	<u>DATE</u>
10	March 27, 2019
11	April 2, 2019
12	April 11, 2019

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNTS 13-31**THE GRAND JURY FURTHER CHARGES:**

That on or about the dates set forth below, in the District of South Carolina and elsewhere, the Defendants listed below, knowingly and intentionally did use a communication facility, that is, a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to distribute, possession with intent to distribute, and distribution of cocaine, a Schedule II controlled substance; cocaine base (commonly known as "crack" cocaine), a Schedule II controlled substance; heroin, a Schedule I controlled substance; and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and did aid and abet each other in the commission of the aforesaid offense;

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>
13	October 15, 2018	CARLTON EDWARDS , a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe" JULIUS WASHINGTON
14	October 17, 2018	CARLTON EDWARDS , a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe" DIANE ELLIS , a/k/a "Diane Thompson," a/k/a "Miss D"
15	October 19, 2018	CARLTON EDWARDS , a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe" KERICE CHATRIE-BONNEY , a/k/a "the niece"

16	October 21, 2018	CARLTON EDWARDS , a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe" [REDACTED]
17	December 8, 2018	KEITH CHISHOLM , a/k/a "Saul" [REDACTED] [REDACTED]
18	December 10, 2018	KEITH CHISHOLM , a/k/a "Saul" DOMINIQUE DASHER
19	December 11, 2018	KEITH CHISHOLM , a/k/a "Saul" ANDREW GRAHAM , a/k/a "Brandy"
20	December 19, 2018	KEITH CHISHOLM , a/k/a "Saul" RODRICK CHISHOLM
21	December 26, 2018	KEITH CHISHOLM , a/k/a "Saul" DAMIAN MASON
22	January 2, 2019	KEITH CHISHOLM , a/k/a "Saul" MIKEL MILLIDGE , a/k/a "Savage"
23	February 6, 2019	JOSEPH JEFFERSON , a/k/a "Joe," a/k/a "Little Joe"
24	February 23, 2019	KEITH CHISHOLM , a/k/a "Saul"
25	February 25, 2019	MATTHEW JAMES , a/k/a "Family"
26	February 25, 2019	MICHAEL HUBBART , a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman"
27	February 26, 2019	CARLTON EDWARDS , a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe"

28	June 9, 2019	MICHAEL HUBBART , a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman" ANTTWON HAYNES
29	June 15, 2019	MICHAEL HUBBART , a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," [REDACTED]
30	June 29, 2019	MICHAEL HUBBART , a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman" WAYLAND PARKER , a/k/a "the mail man"
31	June 7, 2019	MICHAEL HUBBART , a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman" ROBERICK MOULTRIE , a/k/a "Tootie"

All in violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

COUNT 32

THE GRAND JURY FURTHER CHARGES:

That on or about August 29, 2018, in the District of South Carolina, the Defendant, **WALTER BEATON**, knowingly, intentionally and unlawfully did possess with intent to distribute 28 grams or more of a mixture or substance containing cocaine base (commonly known as "crack" cocaine), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 33

THE GRAND JURY FURTHER CHARGES:

That on or about August 29, 2018, in the District of South Carolina, the Defendant, **WALTER BEATON**, knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 34

THE GRAND JURY FURTHER CHARGES:

That on or about July 24, 2019, in the District of South Carolina, the Defendant, **KEITH CHISHOLM**, a/k/a "Saul," knowingly, intentionally and unlawfully did possess with intent to distribute 500 grams or more of a mixture of substance containing a detectable amount of cocaine, a Schedule II, controlled substance and a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(D).

COUNT 35

THE GRAND JURY FURTHER CHARGES:

That on or about July 24, 2019, in the District of South Carolina, the Defendant, **KEITH CHISHOLM**, a/k/a "Saul," knowingly did possess a firearm in and affecting interstate commerce, that is a Smith & Wesson .40 caliber handgun, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 36

THE GRAND JURY FURTHER CHARGES:

That on or about July 24, 2019, in the District of South Carolina, the Defendant, **KEITH CHISHOLM**, a/k/a "Saul," knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 37

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **LEBERT FRAZER**, a/k/a "Dread," a/k/a "the Dreadder," knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 38

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **LEBERT FRAZER**, a/k/a "Dread," a/k/a "the Dreadder," knowingly did possess a firearm in and affecting commerce, that is a Rossi .357 caliber handgun, being an alien illegally and unlawfully present in the United States, and knowing that he was an alien illegally and unlawfully present;

In violation of Title 18, United States Code, Sections 922(g)(5), 924(a)(2), and 924(e).

COUNT 39

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **LEBERT FRAZER**, a/k/a "Dread," a/k/a "the Dreadder," knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 40

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **MATTHEW JAMES**, a/k/a "Family," knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 41

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **MATTHEW JAMES**, a/k/a "Family," knowingly did possess firearms in and affecting commerce, that is a Century Arms 7.62x39 semi-automatic rifle, a Jimenez Arms .380 handgun, and a Kel Tec 9mm handgun, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 42

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **MATTHEW JAMES**, a/k/a "Family," knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 43

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **BRANDON GLOVER**, knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 44

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **BRANDON GLOVER**, knowingly possessed a firearm in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 45

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **DIAMOND FLOYD**, a/k/a "Diamond Dimebag," knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of marijuana, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 46

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **DIAMOND FLOYD**, a/k/a "Diamond Dimebag," knowingly did possess firearms in and affecting commerce, that is a Micro Draco AK 7.62 x 39 rifle, a Glock 19 9mm handgun, and a Glock 32 .357 handgun, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that she had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 47

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **DIAMOND FLOYD**, a/k/a "Diamond Dimebag," knowingly possessed firearms in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 48

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," knowingly, intentionally and unlawfully did possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), a Schedule II, controlled substance and a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C).

COUNT 49

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," knowingly possessed firearms in furtherance of a drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 50

THE GRAND JURY FURTHER CHARGES:

That on or about July 25, 2019, in the District of South Carolina, the Defendant, **JOSEPH JEFFERSON**, knowingly did possess a firearm in and affecting commerce, that is a Taurus 9mm handgun, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 51

THE GRAND JURY FURTHER CHARGES:

That on or about July 26, 2019, in the District of South Carolina, the Defendants, **ROBERICK MOULTRIE** and [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] knowingly, intentionally and unlawfully did possess with intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 52

THE GRAND JURY FURTHER CHARGES:

That on or about July 26, 2019, in the District of South Carolina, the Defendant, [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED] knowingly possessed a firearm in furtherance of a
drug trafficking crime, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION

FIREARM/DRUG-TRAFFICKING OFFENSES:

Upon conviction for felony violation of Title 18 and 21, United States Code as charged in this Superseding Indictment, the Defendant, **CARLTON EDWARDS**, a/k/a "Pops," a/k/a "Aubrey Hall," a/k/a "Carlton King," a/k/a "Renaldo Peters," a/k/a "Kelvin Bell," a/k/a "Cujo," a/k/a "Joe," **MICHAEL HUBBART**, a/k/a "FD Boy," a/k/a "fedex," a/k/a "Jason Benjamin," a/k/a "the Xman," **JOSEPH JEFFERSON**, a/k/a "Joe," a/k/a "Little Joe," **KEITH CHISHOLM**, a/k/a "Saul," **MATTHEW JAMES**, a/k/a "Family", **DIANE ELLIS**, a/k/a "Diane Thompson," a/k/a "Miss D," **RODRICK CHISHOLM**, **KENTON BONNEY**, a/k/a "Clinton," **KERICE CHATRIE-BONNEY**, a/k/a "the niece," [REDACTED] **WAYLAND PARKER**, a/k/a "the mail man," [REDACTED], **JULIUS WASHINGTON**, **SHAQUELLE SMITH**, **JOHN NIXON**, **DAMIAN MASON**, **DOMINIC DASHER**, **RICHARD WHITE**, **AKEAME SPENCE**, **TERRILL HOSKINS**, **MIKEL MILLIDGE**, a/k/a "Savage," [REDACTED] [REDACTED] [REDACTED] **ANTTWON HAYNES**, **BRANDON GLOVER**, **ANDREW GRAHAM**, a/k/a "Brandy," **WALTER BEATON**, **LEBERT FRAZER**, a/k/a "Dread," a/k/a "the Dredder," **DIAMOND FLOYD**, a/k/a "Diamond Dimebag," **ROBERICK MOULTRIE**, a/k/a "Tootie," and [REDACTED] [REDACTED] [REDACTED] [REDACTED] shall forfeit to the United States all of the Defendants' right, title and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –

- (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
- (2) involved in or used in any knowing violation of 18 U.S.C. §§ 922 and 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence;

PROPERTY:

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

A. Firearms:

1. Smith & Wesson, SW40VE (.40 cal), RAV8859
2. Century Arms, RAS47 (7.62 x 39), RAS47072470
3. Jimenez Arms, (J.A .380), 403747
4. Kel Tec CNC, P-11, (9mm) AYZ96
5. Glock 22C (.40 cal), EDV296
6. Springfield Armory, XDS (9mm), 53769863
7. Taurus, G2C (9mm), TLY32774
8. Taurus G2C (9mm), TLN19552
9. Taurus G2C (9mm), TLD94934
10. American Tactical, Fire Fly (.22), F382408
11. Rossi (.357), IS139182
12. Kel Tec P3AT (.380), HKM04

13. Glock 43 (9mm), BLDN248
14. WASR-10 (7.62 x 39), 1-70926-04
15. SCCY CPX-2 (9mm), 546624
16. Ruger LCP (.380), 325-80768
17. Micro Draco AK (7.62 x 39), PMD-10243-18R0
18. Glock 19 (9mm), BGZG507
19. Glock 32 (.357), BHGY251
20. Glock 27 (.40 cal), BFBR147
21. Taurus PT92AFS (9mm), TFR10349
22. Smith & Wesson Body Guard (.380), EBJ7388
23. Smith & Wesson (.40), FXS6573
24. Glock 23 (.40), BDDY715

B. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto as a result for their violation of Title 21 United States Code.

Cash/United States Currency:

\$89,895 in United States Currency seized from **KENTON BONNEY**

\$2,369 in United States Currency seized from the residence of **LEBERT FRAZER**

\$34,426 in United States Currency seized from the residence of **DIAMOND FLOYD**

\$2,877 in United States Currency seized from the residence of
MICHAEL HUBBART

\$4,825 in United States Currency seized from the vehicle of **KEITH
CHISHOLM**

\$5,328.41 in United States Currency seized from the vehicle in which [REDACTED]
[REDACTED] and **ROBERICK MOULTRIE** were located

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

SENTENCING ENHANCEMENT PROVISIONS

THE GRAND JURY FURTHER CHARGES:

The Defendants, **CARLTON EDWARDS, KEITH CHISHOLM, JOSEPH JEFFERSON, RODRICK CHISHOLM, RICHARD WHITE**, and **ANDREW GRAHAM**, prior to committing the violation(s) contained in this Superseding Indictment, had the following conviction(s) for serious drug felon(ies) and/or for serious violent felon(ies), pursuant to Title 21, United States Code, Sections 802(57) and (58), that had become final for the purposes of Title 21, United States Code, Section 841:

1. CARLTON EDWARDS

- a. April 14, 1998 – a conviction for a serious drug felony in the Southern District of California, Indictment Number 97-cr-3438-H, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Counts 1 and 2 of this Indictment.

2. KEITH CHISHOLM

- a. May 20, 1999 – a conviction for a serious drug felony in the District of South Carolina, Charleston Division, South Carolina, 9:98-cr-322, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offenses charged in Count 1 of this Indictment.

3. JOSEPH JEFFERSON

- a. January 07, 2002 – a conviction for a serious drug felony in the District of South Carolina, Charleston Division, South Carolina, 2:01-cr-00933, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offenses charged in Count 1 of this Indictment.

4. RODRICK CHISHOLM

- a. December 5, 2000 – a conviction for a serious drug felony in the District of South Carolina, Charleston Division, South Carolina, 9:98-cr-687, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offenses charged in Count 1 of this Indictment.

5. RICHARD WHITE

- a. January 22, 2003 – a conviction for a serious drug felony in the District of South Carolina, Charleston Division, South Carolina, 9:98-cr-322, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offenses charged in Counts 1, 8, 9, and 10 of this Indictment.

6. ANDREW GRAHAM

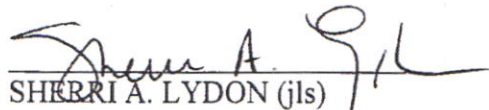
- a. January 10, 2000: a conviction for a serious drug felony in the District of South Carolina, Charleston Division, South Carolina, 9:99-cr-663, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offenses charged in Count 1 of this Indictment.

All in violation of Title 21, United States Code, Sections 802, 841 and 851.

A TRUE

Bill




SHERRI A. LYDON (jls)
UNITED STATES ATTORNEY